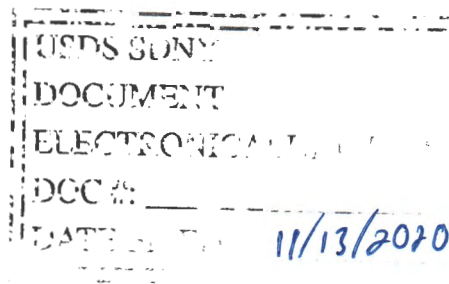




November 13, 2020

Via ECF

Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312



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Re: *Knight v. Deloitte Touche Tohmatsu Limited, et al.*, S.D.N.Y. Case 1:20-cv-07114-JGK

Dear Judge Koeltl:

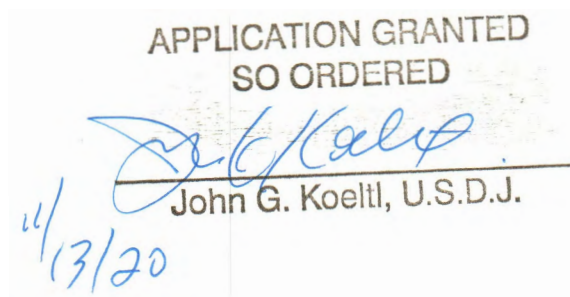
On behalf of Deloitte & Touche LLP (“Deloitte”) in the above-referenced matter, we respectfully move to stay class discovery, for good cause and with the consent of Plaintiff, pending the Court’s ruling on Deloitte’s Motion to Strike Plaintiff’s Class Allegations (“Motion”), Dkt. No. 16.¹ Whether good cause exists for such a stay turns on (1) whether “there is a strong showing that the plaintiff’s claim is unmeritorious;” (2) “the burden of responding to [discovery]”, and (3) “the risk of unfair prejudice to the party opposing the stay.” *Trs. of NYC Dist. Council of Carpenters Pension Fund v. Showtime on Piers LLC*, 2019 WL 6912282, at *1–2 (S.D.N.Y. Dec. 19, 2019). Based on these factors, class discovery should be stayed pending resolution of the Motion. Deloitte has made the strong showing required, *see, e.g., id.* (“strong showing” possible where motion “is potentially dispositive, and appears to be not unfounded in the law”), class discovery would be burdensome and expensive, involving many of Deloitte’s employees and nationwide practices, and Plaintiff does not argue that she would be prejudiced.

Therefore, Deloitte respectfully moves to stay class discovery pending resolution of its Motion.

Respectfully submitted,

/s/ Jill L. Rosenberg
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¹ The parties agree to proceed with discovery on Plaintiff’s individual claims.